

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b> <b>SCOTT A. THOMAS,</b> <b>Debtor</b>	<b>: Case No. 21-12333-ELF</b> <b>:</b> <b>: Chapter 11</b> <b>:</b> <b>: Hearing Date: February 16, 2022</b> <b>: Time: 11:00 am</b> <b>: Location: Robert N. C. Nix Sr. Federal</b> <b>: Courthouse, Courtroom #1</b> <b>: 900 Market Street, Suite 400</b> <b>: Philadelphia, PA 19107</b>
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**DEBTOR'S MOTION TO DISMISS CASE**  
**PURSUANT TO 11 U.S.C. SECTION 1112(b)**

The Motion of the Debtor, Scott A. Thomas, by his counsel, respectfully represents:

1. The above-captioned case was commenced by the filing of a voluntary petition for relief under Subchapter V of Chapter 11 of the Bankruptcy Code on August 21, 2021.
2. The Debtor is a debtor in possession.
3. A proposed plan of reorganization has been filed in this case but has not been confirmed.
4. Pursuant to 11 U.S.C. Section 1112(b), cause exists for dismissal of this case because the Debtor's business has not generated sufficient net income to adequately fund a plan of reorganization, and the Debtor will not be able to effectuate a confirmable plan.
5. The case has not previously been converted under any section of the Bankruptcy Code.
6. No fees are due to the United States Trustee.
7. The Debtor's assets are fully encumbered and conversion to Chapter 7 will produce no distribution to unsecured creditors.
8. The Debtor therefore believes that dismissal of this case is in the best interest of creditors and the estate.

WHEREFORE, the Debtor respectfully requests that the case be dismissed, and that he have such other and further relief as may be appropriate.

Date: January 14, 2022

Respectfully submitted,  
JOHN R. K. SOLT, P.C.

By: /s/ John R. K. Solt

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